

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF NORTH CAROLINA

WAI MAN TOM, on behalf of himself and all )  
others similarly situated, )

*Plaintiff,* )

v. )

Case No.: 5:17-CV-00098-FL

HOSPITALITY VENTURES LLC, d/b/a )  
UMSTEAD HOTEL AND SPA, NC )  
CULINARY VENTURES LLC, d/b/a AN )  
ASIAN CUISINE, and SAS INSTITUTE )  
INC., )

*Defendants.*

**JOINT MOTION FOR ENTRY OF STIPULATED PROTECTIVE ORDER**

The parties, through their undersigned counsel, respectfully move the Court to enter the Stipulated Protective Order, attached hereto as Exhibit A. During the course of discovery in this matter, the parties anticipate that documents and information considered private, confidential, and sensitive may be produced. The parties agree that prompt entry of an order authorizing the parties to produce and make available such private, sensitive, and confidential documents and information is necessary for the parties to protect that information from public disclosure and obtain relevant and essential discovery of that material. Accordingly, the parties respectfully request that the Court enter the attached Stipulated Protective Order.

DATED: November 16, 2017

Respectfully submitted,

/s/ Gilda A. Hernandez

Gilda A. Hernandez (NCSB No. 36812)

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**CERTIFICATE OF SERVICE**

I hereby certify that on November 16, 2017, the foregoing **JOINT MOTION FOR ENTRY OF STIPULATED PROTECTIVE ORDER** was served in accordance with the Federal Rules of Civil Procedure on the following:

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